

USDA PRIVACY IMPACT ASSESSMENT FORM

Agency: CSREES**System Name:** CSREES Local Area Network

System Type: ☐ Major Application
☒ General Support System
☐ Non-major Application

System Categorization (per FIPS 199): ☐ High
☒ Moderate
☐ Low

Description of the System:

The CSREES General Support System (GSS) comprises of communications network (LAN/WAN), agency wide backbone, servers, workstations, communication devices, and the physical data centers. The GSS is the underlying infrastructure that enables CSREES to support office automation and enterprise applications that are essential to conducting its missions and objectives.

CSREES relies on distributed computer systems and networks. CSREES Staff are housed primarily in two locations in downtown Washington, DC: The Department of Agriculture Department Administration Building (the Jamie Whitten Building), and in leased space at the Waterfront Centre Building.

The system provides general office automation support (word processing, spreadsheets, etc.) as well as a wide variety of individual or shared applications (proposal tracking, program status reports, etc) to facilitate the management of the agency's programs.

Most CSREES Staff (a mix of clerical, support and professional staff) are provided with Personal Computers (PCs) located in their offices. Each PC includes a hard-disk, floppy-disk, and some are equipped with CD read/write drives. The PCs are connected to a Local Area Network (LAN) to exchange and share information. The central components of the LAN are LAN servers (Windows, Linux and Solaris), which provide a large volume of shared disk storage and shared application programs. These servers provide logical access controls on potentially shareable information via access control lists. These access controls are used to limit user access to various files and programs stored on the server. Some programs stored on the servers can be retrieved via the LAN (e.g. Internet browsers) and executed on a PC; others can only be executed on the server (e.g. electronic mail or e-mail).

Since CSREES frequently communicates with its research, education, and extension partners throughout the Land Grant University System, the LAN also provides a connection to the Internet. This Internet connection provides e-mail and video connectivity which has become the primary method for CSREES Staff to interact with their colleagues and partners at the schools or in county offices

USDA PRIVACY IMPACT ASSESSMENT FORM

CSREES also maintains a World Wide Web (WWW) server or "home page". Information about the agency, the staff, the programs, and partnerships are posted and maintained for use by CSREES Staff, its partners at the state or local level, other USDA or Federal staff, and the general public. This information can be accessed and retrieved without the need for interacting directly with CSREES Staff. Correctness and completeness of material on the server is maintained by the CSREES public affairs staff in the case of general information, or by the functional manager responsible for a program or unit in the case of more detailed unit or program information. World Wide Web servers are also maintained in the Current Research Information System (CRIS) and Research, Education and Economic Information System (REEIS) Offices. The information included on the CRIS server are the agricultural projects from the CRIS database for use by the CSREES Staff, its partners, other Federal staff, and the general public. The REEIS server contains information from many CSREES programs in the Education, Extension, and Research program areas.

CSREES is responsible for the Web-Based Peer Review System (WPRS) software that governs the security of the Cooperative Research, Education and Extension Management System (C-REEMS). C-REEMS allows management of proposal-based processing, review and award of grants, for grant funds management, and for grant administration and closeout. WPRS allows the peer review of grant proposals through the Web. WPRS is an effective interface to conduct the peer-review process remotely.

Who owns this system? (Name, agency, contact information)

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Cooperative State Research, Education and Extension Service
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Who is the security contact for this system? (Name, agency, contact information)

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Who completed this document? (Name, agency, contact information)

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USDA PRIVACY IMPACT ASSESSMENT FORM

DOES THE SYSTEM CONTAIN INFORMATION ABOUT INDIVIDUALS IN AN IDENTIFIABLE FORM?

Indicate whether the following types of personal data are present in the system

QUESTION 1	Citizens	Employees
Does the system contain any of the following type of data as it relates to individual:		
Name	Yes	Yes
Social Security Number	No	No
Telephone Number	Yes	No
Email address	Yes	Yes
Street address		
Financial data	No	
Health data	No	No
Biometric data	No	No
QUESTION 2	No	No
Can individuals be uniquely identified using personal information such as a combination of gender, race, birth date, geographic indicator, biometric data, etc.?		
NOTE: 87% of the US population can be uniquely identified with a combination of gender, birth date and five digit zip code ¹		
Are social security numbers embedded in any field?	No	No
Is any portion of a social security numbers used?	No	No
Are social security numbers extracted from any other source (i.e. system, paper, etc.)?	No	No



If all of the answers in Questions 1 and 2 are NO,

You do not need to complete a Privacy Impact Assessment for this system and the answer to OMB A-11, Planning, Budgeting, Acquisition and Management of Capital Assets, Part 7, Section E, Question 8c is:

3. No, because the system does not contain, process, or transmit personal identifying information.

If any answer in Questions 1 and 2 is YES, provide complete answers to all questions below.

¹ Comments of Latanya Swccncy, Ph.D., Director, Laboratory for International Data Privacy Assistant Professor of Computer Science and of Public Policy Carnegie Mellon University To the Department of Health and Human Services On "Standards of Privacy of Individually Identifiable Health Information". 26 April 2002.

USDA PRIVACY IMPACT ASSESSMENT FORM

DATA COLLECTION**3. Generally describe the data to be used in the system.**

The CSREES Network is a host to CREEMS with the following data:

Customer: CREEMS has no CSREES customer-facing component.

Employee: Program staff constitutes the only employee information CREEMS maintains. In this capacity CREEMS stores only employee information as it pertains to scientific grants. CREEMS does not maintain what are typically understood to be "human resources" records in this regard.

Other: Grant applicants are voluntary data contributors who do not submit their grant application through CREEMS.

The system stores information needed for all applicants, including their Social Security Number (SSN) if the grant applicant is a person, as opposed to a business entity, like a school. The SSN is voluntary information and not required for proposal submission or review. If not provided the data element is left blank.

Grant application reviewers are CSREES temporary business service providers. The system contains personal and professional information related to the non-CSREES personnel who volunteer to provide independent review, rating, and ranking of all proposals accepted for merit review. This information includes:

- Address
- Reviewer (willingness to review, basic background)
- Expertise
- Demographic
- Reviews assigned
- Association with programs

4. Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President.

☒ Yes
☐ No

5. Sources of the data in the system.

5.1. What data is being collected from the customer?

Grant applicants voluntarily provide information regarding themselves and their grant applications. Program Staff maintain reviewer and program-specific data.

USDA PRIVACY IMPACT ASSESSMENT FORM

5.2. What USDA agencies are providing data for use in the system?

There are no other USDA agencies apart from CSREES that provide data for use in the system.

5.3. What state and local agencies are providing data for use in the system?

There are no states or local agencies that provide data for use in the system.

5.4. From what other third party sources is data being collected?

There are no third party data providers.

6. Will data be collected from sources outside your agency? For example, customers, USDA sources (i.e. NFC, RD, etc.) or Non-USDA sources.

- ☒ Yes
☐ No. If NO, go to question 7

6.1. How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?

All data provided by customers is voluntary.

Accuracy: Validation of data against expected parameters is performed at the federal level at grants.gov; at the departmental level at grants.usda.gov; and then at the agency level prior to being loaded into CREEMS.

Relevance: The relevance of data contained in a grant application package to the research area to which it is submitted is evaluated on an individual basis by a panel of experts convened solely for that purpose.

Timeliness: Submission times of grant applications are compared to submission windows of the applicable funding opportunity and its grace period (if any). Grant applications submitted by customers outside this window are not accepted into the agency for consideration.

Completeness: No attempt is made to verify the completeness of grant application data apart from data collected on the SF424 and related forms. Information required by the 424 family of forms that is not complete is screened at the federal and departmental levels prior to being screened at the agency level.

6.2. How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?

USDA PRIVACY IMPACT ASSESSMENT FORM

- 6.3. How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?

The only non-USDA sources of data come from the Department of Health and Human Services (DHHS) in the form of grant payment disbursement information. DHHS data integrity is the responsibility of DHHS.

DATA USE

7. Individuals must be informed in writing of the principal purpose of the information being collected from them. What is the principal purpose of the data being collected?

The goal and mandate for the data being collected is to provide information for monitoring and evaluating the viability, qualification, and award status of scientific research and related grant applications.

8. Will the data be used for any other purpose?

☐ Yes

☒ No. If NO, go to question 9

- 8.1. What are the other purposes?

9. Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President

☒ Yes

☐ No

10. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected (i.e. aggregating farm loans by zip codes in which only one farm exists.)?

☐ Yes

☒ No. If NO, go to question 11

- 10.1. Will the new data be placed in the individual's record (customer or employee)?

☐ Yes

☐ No

USDA PRIVACY IMPACT ASSESSMENT FORM

10.2. Can the system make determinations about customers or employees that would not be possible without the new data?

- ☐ Yes
☐ No

10.3. How will the new data be verified for relevance and accuracy?

11. Individuals must be informed in writing of the routine uses of the information being collected from them. What are the intended routine uses of the data being collected?

The goal and mandate for the data being collected is to provide information for monitoring and evaluating the viability, qualification, and award status of scientific research and related grant applications. This is the only use for the data being collected.

12. Will the data be used for any other uses (routine or otherwise)?

- ☐ Yes
☒ No. If NO, go to question 13

12.1. What are the other uses?

13. Automation of systems can lead to the consolidation of data – bringing data from multiple sources into one central location/system – and consolidation of administrative controls. When administrative controls are consolidated, they should be evaluated so that all necessary privacy controls remain in place to the degree necessary to continue to control access to and use of the data. Is data being consolidated?

- ☐ Yes
☒ No. If NO, go to question 14

13.1. What controls are in place to protect the data and prevent unauthorized access?

14. Are processes being consolidated?

- ☐ Yes
☒ No. If NO, go to question 15

USDA PRIVACY IMPACT ASSESSMENT FORM

- 14.1. What controls are in place to protect the data and prevent unauthorized access?

DATA RETENTION

15. Is the data periodically purged from the system?

☒ Yes
☐ No. If NO, go to question 16

- 15.1. How long is the data retained whether it is on paper, electronically, in the system or in a backup?

- 15.2. What are the procedures for purging the data at the end of the retention period?

- 15.3. Where are these procedures documented?

16. While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?

CREEMS serves as a repository for historical grant application and grant award data. This historical data does not change and therefore storage duration does not have an impact on relevance, accuracy, or completeness.

17. Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?

☒ Yes
☐ No

DATA SHARING

18. Will other agencies share data or have access to data in this system (i.e. international, federal, state, local, other, etc.)?

☐ Yes
☒ No. If NO, go to question 19

- 18.1. How will the data be used by the other agency?

USDA PRIVACY IMPACT ASSESSMENT FORM

18.2. Who is responsible for assuring the other agency properly uses of the data?

19. Is the data transmitted to another agency or an independent site?

- ☐ Yes
☒ No. If NO, go to question 20

19.1. Is there the appropriate agreement in place to document the interconnection and that the PII and/or Privacy Act data is appropriately protected?

20. Is the system operated in more than one site?

- ☐ Yes
☒ No. If NO, go to question 21

20.1. How will consistent use of the system and data be maintained in all sites?

DATA ACCESS

21. Who will have access to the data in the system (i.e. users, managers, system administrators, developers, etc.)?

Database Administrators (DBAs) and developers have access to the full set of C-REEMS data in various stages of development.

22. How will user access to the data be determined?

A hierarchical structure is in place to determine access to system data starting with executive management and trickling down.

22.1. Are criteria, procedures, controls, and responsibilities regarding user access documented?

- ☒ Yes
☐ No

USDA PRIVACY IMPACT ASSESSMENT FORM

23. How will user access to the data be restricted?

Role based access control restricts user access to data. The following are the roles of users in the CSREES System, together with the privileges and actions they can take:

CSREES

Authorizing Person: Bob MacDonald, C-REEMS Project Manager, ISTM 205-5967

Users: General agency staff, FEDERAL EMPLOYEES (Permanent, IPA, or Contracted), not for use by university staff (e.g., panel managers, etc.).

Definition: Select privileges for most of the system.

CREEMS PROJECT OFFICE

Function: Design, development, and implementation of CREEMS.

APP_DEVELOPER

Users: CREEMS developers

Definition: To allow application developers to view, but not alter, data in the production database. Developers are able create, alter, or drop database objects as appropriate.

FUNDS MANAGEMENT BRANCH (FMB)

Function: Management, oversight, and disbursement of agency grant funds.

AUTHORIZATIONS

Users: FMB Staff responsible for creating funds authorizations for DHHS Payment Management System (PMS)

Definition: To allow users to create batch or manual authorizations in C-REEMS, create appropriate batch files and reports involved in authorizing payment of grant funds through PMS.

FMB

Users: FMB

Definition: Basic FMB privileges

FMB ADMIN

Users: Higher level FMB Staff

Definition: Allows delete on FDCs, payee accounts, payment methods; insert on payee accounts, payment methods, RAD certifications; update on award financial information, FDC data, FMB file locations, FMB names, payee accounts, and payment methods.

FMB DISBURSE

Users: FMB Staff that work on disbursements.

Definition: Privileges associated with entering disbursements into C-REEMS.

FMB FAADS

Users: FMB Staff that work on FAADS.

Definition: Privileges associated with maintenance of FAADS data.

FORMULA

Users: FMB Staff that compute and obligate formula funds

USDA PRIVACY IMPACT ASSESSMENT FORM

Definition: Privileges associated with setting up, computing, and obligating formula funds, including the ability to create and modify FDC codes.

GIVEPRIV.MOVEDISBURSENT

Users: Specific FMB Staff

Definition: Ability to move funds from one Fiscal Year (FY) to another.

REIMBURSABLE.TREASURYID

Users: Specific FMB Staff

Definition: Allows selection of Treasury Symbol for Reimbursable Classes in the Budget Office Reimbursable screen.

BUDGET OFFICE

Function: Establishment, oversight, and management of the agency budget.

BUDGET OFFICE

Users: Budget Office Staff are responsible for inputting budget data into CREEMS.

Definition: Users can modify data in the Budget Office screens, with the exception of the FDC subscreens.

BUDGET OFFICE TRACKING

Users: Budget Office Staff responsible for maintaining tracking codes.

Definition: Allows user to modify data in the Budget Office Tracking and the NSF FOS reference screens.

PROGRAM OFFICES

Function: Review and recommendation of proposals for award, post-award monitoring and management, maintenance of reviewer information.

Authorizing Person: Many offices which may change from year-to-year, so best defined by all agency employees excluding those in the Budget Office, Proposal Services Unit, Awards Management Branch, Funds Management Branch, ISTM, and the Office of the Administrator. None of these offices should have roles assigned below to the program offices. Includes all staff in PAS, NRE, F4HN, ECS, SERD, and Competitive Programs. Panel managers are not to be granted this role.

RAD

Users: All program office staff

Definition: General program office privileges, including the ability to enter RADS and track awards.

PROGRAM TRACKING

Users: Program staff responsible for maintaining program-specific award tracking codes

Definition: Users can modify the data in the Program Offices Program-Specific Tracking Codes reference screen.

DSHIGHED

Users: Select Higher Education Staff

Definition: Select privileges to allow their Access database software to function.

AWARDS MANAGEMENT BRANCH

Function: Review and award of proposals recommended by the program offices, post-award management.

USDA PRIVACY IMPACT ASSESSMENT FORM

CONGRESS NOTIF

Users: AMB Staff responsible for maintaining information about Congressional Representatives.

Definition: Users can modify the data in the Senators and Representatives Awards Management Reference Screens, required for the issuance of Congressional Notifications of awards.

GRANTS ADMIN

Users: AMB

Definition: General Awards Management Branch privileges.

GRANTS REF TABLES

Users: AMB Staff responsible for maintaining awards management reference tables.

Definition: Maintenance of awards management reference tables.

GIVEPRIV.REVISEOBLIGATEDFDC

Users: AMB Branch Chief and Section Leaders

Definition: Allows correction of FDC codes after an award is obligated, authorized, and then de-obligated at HHS through the Revise Obligated FDCs screen.

PROPOSAL SERVICES UNIT

Function: Entry and management of proposals, entry and maintenance of PD and AOR data.

PSU

Users: PSU Staff

Definition: Users can modify enter and maintain all PSU data.

GIVEPRIV.DELETEPROPOSAL

Users: Head of PSU

Definition: Allows deletion of erroneous grant application records (if no child records).

- 23.1. Are procedures in place to detect or deter browsing or unauthorized user access?

☒ Yes
☐ No

24. Does the system employ security controls to make information unusable to unauthorized individuals (i.e. encryption, strong authentication procedures, etc.)?

☒ Yes
☐ No

CUSTOMER PROTECTION

25. Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface (i.e. office, person, departmental position, etc.)?

The Information Systems Security Office

USDA PRIVACY IMPACT ASSESSMENT FORM

26. How can customers and employees contact the office or person responsible for protecting their privacy rights?

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27. A "breach" refers to a situation where data and/or information assets are unduly exposed. Is a breach notification policy in place for this system?

- ☒ Yes. If YES, go to question 28
☐ No

27.1. If NO, please enter the POAM number with the estimated completion date:

28. Consider the following:

- Consolidation and linkage of files and systems
- Derivation of data
- Accelerated information processing and decision making
- Use of new technologies

Is there a potential to deprive a customer of due process rights (fundamental rules of fairness)?

- ☐ Yes
☒ No. If NO, go to question 29

28.1. Explain how this will be mitigated?

29. How will the system and its use ensure equitable treatment of customers?

The system stores the same data for all customers. It is not the role or responsibility of software/hardware systems to guarantee that customers who voluntarily elected to submit data to the system are equitably treated by the agency. The system simply stores grant application related data. The equitability of decisions that are made by agency personnel based on the system data are governed by business process and information policy.

USDA PRIVACY IMPACT ASSESSMENT FORM

30. Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?

- ☐ Yes
☒ No. If NO, go to question 31

30.1. Explain

SYSTEM OF RECORD

31. Can the data be retrieved by a personal identifier? In other words, does the system actually retrieve data by the name of an individual or by some other unique number, symbol, or identifying attribute of the individual?

- ☐ Yes
☒ No. If NO, go to question 32

31.1. How will the data be retrieved? In other words, what is the identifying attribute (i.e. employee number, social security number, etc.)?

31.2. Under which Systems of Record notice (SOR) does the system operate? Provide number, name and publication date. (SORs can be viewed at www.access.gpo.gov)

Federal Register, Vol. 68, No. 231, Tuesday, December 2, 2003, pgs. 67396-67397.

31.3. If the system is being modified, will the SOR require amendment or revision?

No.

TECHNOLOGY

32. Is the system using technologies in ways not previously employed by the agency (e.g. Caller-ID)?

- ☐ Yes
☒ No. If NO, the questionnaire is complete.

32.1. How does the use of this technology affect customer privacy?

USDA PRIVACY IMPACT ASSESSMENT FORM

Upon completion of this Privacy Impact Assessment for this system, the answer to OMB A-11, Planning, Budgeting, Acquisition and Management of Capital Assets, Part 7, Section E, Question 8c is:

1. Yes.

PLEASE SUBMIT A COPY TO
THE OFFICE OF THE ASSOCIATE CHIEF INFORMATION OFFICE/CYBER SECURITY

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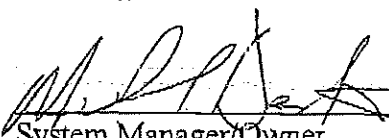
Privacy Impact Assessment Authorization Memorandum

I have carefully assessed the Privacy Impact Assessment for the

CSREES Local Area Network
(System Name)

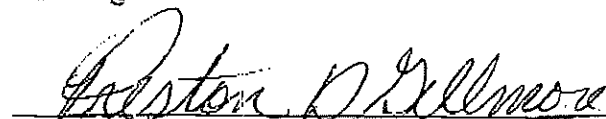
This document has been completed in accordance with the requirements of the
EGovernment Act of 2002.

We fully accept the changes as needed improvements and authorize initiation of work to
proceed. Based on our authority and judgment, the continued operation of this system is
authorized.



System Manager/Owner
OR Project Representative
OR Program/Office Head.

9/13/07
Date



Agency's Chief FOIA officer
OR Senior Official for Privacy
OR Designated privacy person

9/18/07
Date



Agency OCIO

9/18/07
Date